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ROBERT ALLEN POOLEY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT ALLEN POOLEY,

Defendants.

Case No. 2:21-cr-00111-WBS

**DEFENDANT'S PROPOSED STATEMENT
OF THE CASE**

Date: May 15, 2024

Time: 9:00 A.M.

Judge: Hon. William B. Shubb

Defendant Robert Pooley proposes the following statement of the case, to be read to prospective jurors upon the commencement of *voir dire*:

The United States has brought criminal charges against the defendant in this case, Robert Pooley. Mr. Pooley is charged with wire fraud by allegedly participating in a scheme to defraud skydiving students who were attempting to gain tandem skydiving certifications. Mr. Pooley is also charged with aggravated identity theft for using the signature of another instructor on paperwork.

To prove the charges, the government must show that Mr. Pooley made material misrepresentations for the purpose of obtaining money or property, and that he used or caused to be used a wire communication in order to carry out that scheme. To prove aggravated identity theft, the government must show that, during and in relation to the wire fraud, Mr. Pooley used and possessed the means of identification of another person, without legal authority. Mr. Pooley

has pled not guilty to all the charges.

Date: May 6, 2024

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

/s/ Meghan D. McLoughlin
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ROBERT POOLEY